## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

GREGORY J. LAUREANNO,

Plaintiff

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THEODORE WILLIAM BACALIS

Defendants

C.A. NO. 04-11592 RCL

## Local Rule 35.1 Disclosure of Medical Information in Personal Injury Cases

On February 25, 2003, March 19, 2004, and June 18, 2004, Plaintiff has provided to Defendant's insurer written itemizations of all medical expenses incurred before the date of service of the pleading containing the claim for which recovery is sought. Plaintiff anticipates that recovery will be sought for future medical expenses. Nevertheless, Plaintiff will permit inspection and photocopying, at Defendant's expense, all non-privileged medical records pertaining to the diagnosis, care, or treatment of injuries for which recovery is sought. However, Plaintiff has herewith produced, at no cost to Defendant, all of the non-privileged medical and hospital records (and bills) otherwise required under this rule to be made available to Defendant.

Respectfully submitted,

The Plaintiff, by his attorney,

William E. McKeon, Jr., Esquire

B.B.O. No.: 336510 Ten North Main Street

Fall River, Massachusetts 02720

508/677-4424

Dated: September 29, 2004

## CERTIFICATE OF SERVICE

I, William E. McKeon, Jr., Esq. hereby certify that this document was served on all counsel of record this day, September 29, 2004, by First Class U.S. mail, postage prepaid.

William E. McKeon, Jr., Esquire